

COOLEY GODWARD KRONISH LLP
GRANT P. FONDO (181530) (gfono@cooley.com)
JESSICA VALENZUELA SANTAMARIA (220934) (jsantamaria@cooley.com)
BRANDON KIMURA (241220) (bkimura@cooley.com)
Five Palo Alto Square
3000 El Camino Real
Palo Alto, CA 94306-2155
Telephone: (650) 843-5000
Facsimile: (650) 857-0663

Attorneys for Plaintiff RICHARD CARRASCO

OFFICE OF THE COUNTY COUNSEL
MELISSA KINIYALOCTS (215814) (Melissa.Kiniyalocts@cco.sccgov.org)
Deputy County Counsel
70 W. Hedding Street
East Wing, 9th Floor
San Jose, CA 95110-1770
Telephone: (408) 299-5937
Fax: (408) 292-7240

Attorneys for Defendants OFFICER CAMPAGNA, et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD CARRASCO,

Plaintiff,

v.

OFFICER CAMPAGNA, et al.,

Defendants.

Case No. C 03-4727 SBA (EMC)

**STIPULATED [~~PROPOSED~~] ORDER
GRANTING PLAINTIFF'S MOTION TO
COMPEL DISCOVERY RESPONSES UNDER
FEDERAL RULES OF CIVIL PROCEDURE
30(b)(6), 33 AND 34**

Pursuant to this Court's instructions during the hearing on Plaintiff's Motion to Compel Discovery Responses Under Federal Rules of Civil Procedure 30(B)(6), 33 and 34 held on November 7, 2006, Plaintiff Richard Carrasco, ("Plaintiff") and Defendants David Campagna and Alex Holguin (collectively, the "Defendants") submit this Stipulation and [Proposed] Order Granting Plaintiff's Motion to Compel Discovery Responses Under Federal Rules of Civil Procedure 30(B)(6), 33 and 34. Specifically, the parties stipulate that Defendants will produce the following information from their employment files:

1. All documents relating to the diagnoses, medical care, or treatment received for injuries suffered by Defendants as a result of the October 15, 2002 incident.
2. All documents relating to Defendants' training on and performance evaluations concerning the following topics: (1) use of force; (2) restraining inmates; (3) transporting inmates; and (4) interacting with inmates who are agitated and/or inciting their housing unit.
3. All documents relating to complaints by inmates other than Plaintiff Richard Carrasco regarding allegations of excessive force against Defendants and all documents relating to investigations of any such complaints. Defendants may redact confidential classification codes pertaining to the complaining inmates within any relevant investigation files. If Defendants make any redactions of classification information, however, they must provide Plaintiff with an affidavit detailing classification information equivalent to that available to line officers who were responsible for supervising those inmates.

Respectfully submitted,

Dated: November ____, 2006

COOLEY GODWARD LLP
GRANT P. FONDO (181530)
JESSICA VALENZUELA SANTAMARIA (220934)
BRANDON KIMURA (241220)

/s/

Brandon Kimura (241220)
Attorneys for Plaintiff RICHARD CARRASCO

Dated: November ____, 2006

OFFICE OF THE COUNTY COUNSEL
ANN MILLER RAVEL (62139)
MELISSA R. KINIYALOCTS (215814)

/s/

Melissa R. Kiniyalocts (215814)
Attorneys for Defendants
OFFICER CAMPAGNA and OFFICER HOLGUIN

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: November 14, 2006

EDWARD M. CHEN
UNITED STATES MAGISTRATE JUDGE

2.

